

UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF NORTH CAROLINA
WESTERN DIVISION

NO. 5:13-CR-123-1D(1) FILED IN OPEN COURT
ON 4-23-2013 *dc*
Julie A. Richards, Clerk
US District Court
Eastern District of NC

UNITED STATES OF AMERICA

v.

CHRISTOPHER JASON WILLIAMS

INDICTMENT

The Grand Jury charges that:

COUNT ONE

(Sex Trafficking of Children)

During a period of time including in or about December 2012 and in or about January 2013, in the Eastern District of North Carolina, the defendant, CHRISTOPHER WILLIAMS, did knowingly recruit, entice, harbor, transport, provide, obtain and maintain, by any means, in and affecting interstate and foreign commerce, Victim One (1)¹, knowing and in reckless disregard for the fact that Victim One (1) had not attained the age of 18 years and that Victim One (1) would be caused to engage in a commercial sex act, in violation of Title 18, United States Code, Sections 1591(a)(1) and 1591(b)(2).

COUNT TWO

(Sex Trafficking of Children)

During a period of time including in or about December 2012 and in or about January 2013, in the Eastern District of North Carolina, the defendant, CHRISTOPHER WILLIAMS, did knowingly recruit, entice, harbor, transport, provide, obtain and maintain, by any means, in and affecting interstate and foreign commerce, Victim Two (2), knowing and in reckless disregard for

¹ To protect the privacy of the victims, the minors are identified solely as Victim One (1) and Victim Two (2); their identities are known to the Grand Jury.

the fact that Victim Two (2) had not attained the age of 18 years and that Victim Two (2) would be caused to engage in a commercial sex act, in violation of Title 18, United States Code, Sections 1591(a)(1) and 1591(b)(2).

COUNTS THREE THROUGH TEN
(Manufacture/production of child pornography)

On or about the dates set forth below, in the Eastern District of North Carolina, the defendant, CHRISTOPHER WILLIAMS, did knowingly attempt to and did employ, use, persuade, induce, entice, and coerce minors (whose identities are known to the Grand Jury) to engage in sexually explicit conduct for the purpose of producing visual depictions of such conduct, to wit, digital photographs and video, on or about the dates set forth below:

Count	Date (on or about)	Minor	Title of Image
3	November 11, 2012	Victim One	video-2012-11-11-15-51-30.mp4
4	August 23, 2012	Victim One	2012-08-23.11.49.14.jpg
5	October 25, 2012	Victim One	2012-10-25.20.59.03.jpg
6	January 3, 2013	Victim One	2013-01-03.21.09.54.jpg
7	November 11, 2012 <i>PH</i>	Victim One	1352668364283.jpg
8	December 15, 2012	Victim One	.thumbdata3—1967290299_embedded_357.jpg
9	December 15, 2012	Victims One & Two	.thumbdata3—1967290299_embedded_343.jpg
10	December 15, 2012	Victim Two	.thumbdata3—1967290299_embedded_338.jpg

Each of the visual depictions described above was produced using materials that had been mailed, shipped and transported in interstate and foreign commerce. Each of the images listed in

the table above constitutes a separate violation of Title 18, United States Code Sections 2251(a) and (e).

FORFEITURE ALLEGATION

If convicted of one or more of the offenses set forth in Counts One (1) through Eighteen (18) above, Christopher Williams, the defendant herein, shall forfeit to the United States —

(1) any visual depiction or book, magazine, periodical, film, videotape, or other matter which contains any such visual depiction, which was produced, transported, mailed, shipped or received in violation of the offense(s);

(2) any property, real or personal, constituting or traceable to gross profits or other proceeds obtained from the offense(s); and

(3) any property, real or personal, used or intended to be used to commit or to promote the commission of such offense(s)

— all pursuant to Title 18, United States Code, Section 2253(a).

The forfeitable property includes, but is not limited to:

1. Samsung phone, model SGH-T499, Serial number R21C153DZQA

If any of the above-described forfeitable property, as a result of any act or omission of the defendant --

(1) cannot be located upon the exercise of due diligence;

(2) has been transferred or sold to, or deposited with, a
third person;

(3) has been placed beyond the jurisdiction of the court;

(4) has been substantially diminished in value; or


(5) has been commingled with other property which cannot be subdivided without difficulty; it is the intent of the United States, pursuant to Title 18, United States Code, Sections 2253 or 1467, whichever may be applicable, to seek forfeiture of any other property of said defendant up to the value of the above forfeitable property.

REDACTED VERSION

A ~~TRUE~~ BILL Pursuant to the E-Government Act and the
Foreperson federal rules, the unredacted version of
this document has been filed under seal.

Date: 4/23/13

THOMAS G. WALKER
United States Attorney


BY: LESLIE K. COOLEY
Assistant United States Attorney
Criminal Division